GEORTO, INC. v. WILLIAM GATEMAN v. ROBERTS CORPORATION, U.S. DIST. COURT, MASS., CIVIL ACTION NO: CV-04-11730-NG

## JOINT EXHIBIT LIST

Trial						
Exhibit Number	Description	Date	Bates No Range	Sponsoring Party	Objection Rv	Objection Basis
	Agreed Exhibits To Be Admitted As			Ć		
	Evidence At Trial					
-	Stipulated facts			JOINT		
	Selected Site Plans / Schematics / Maps,					
	including but not limited to selected deposition			GEO-1A/		
2	exhibits.			GAT-4		
	Photographs of property, including selected					
	deposition exhibits, photos in reports, photos			GEO-1B/		
ო	produced by Family Dollar.			GAT-5		
	Declaration of Trust Establishing 200 Union					
4	Street Realty Trust	12/18/1996		GEO-1G		
	Deed of Purchase of Union Street Property by			GAT-12/		
2	William Gateman	12/18/1996		ROB-12		
	Selected documents from City of Lynn Building					
9	Department file re property			GE0-2V		
7	Demolition Permit dated October 9, 2001	10/9/2001	P0608	GEO-1L		
	Letter dated March 4, 2002 from Francis Calnan					
8	to William Gateman	3/4/2002		GEO-1M		
	Roberts-Gateman contract dated March 12.			GEO-1N / GAT-2 / ROB		
<u>ი</u>	2002	3/12/2002	ROB000069			
			ROB000009 -			
10	Demolition Applications	3/14/2002	ROB000012	GEO-2A		
	ROB-9. Roberts Corporation's Invoice,		ROB000070 -			
	Accounting Records, and Receipt Payment		ROB000079;	GE0-10 /		
	Regarding Demolition of 200 Union Street,	3/12/2002 -	ROB000083 -	ROB-9 / GAT		
11	Lynn, MA	7/1/2002	ROB000088	6		

12	Roberts Corporation Daily Tracking Reports	3/14/2002 - 6/5/2002	ROB000006 - ROB000008	GEO-2E / ROB-4	
13	Roberts Corporation Daily Job Reports	3/26/2002 - 4/12/2002	ROB000039 - ROB000051	GEO-2E / ROB-4	
4	Roberts Corporation's Documents Concerning Asbestos Removal from 200 Union Street, Lynn, MA	3/14/2002 - 5/9/2002	ROB000036 - ROB000038; ROB000052 - ROB000067; ROB000080 -	ROB-8	
15	Roberts Corporation's Landfill Receipts for Loads of Demolition Removed from 200 Union Street, Lynn, MA	4/1/2002 -	ROB000017 - ROB000035	ROB-7	
16	Family Dollar Contract for Purchase and Sale of Real Estate	4/26/2002		ROB-11 / GAT-11	
17	Fax transmission from Gateman to Family Dollar dated May 7, 2002	5/7/2002		GEO-2C	
18	Deed of Purchase of Union Street Property by Family Dollar			GAT-11 / ROB-11	
19	Contract for Purchase and Sale of Real Estate dated June 18, 2003 between Gateman and Georto	6/18/2003		GEO-1C / GAT-3 / ROB- 2	
20	GEC Phase I Environmental Site Assessment	5/29/2002		GEO-1H / GAT-3	
21	Contract for Purchase and Sale of Real Estate dated April 26, 2002 between Gateman and Family Dollar, as faxed to Georto by Gateman's counsel on July 7, 2003	7/7/2003	P0454 - P0472	GE0-1K	
22	GEC Reliance Letter to James Hawkins dated December 11, 2003, with fax cover sheet	12/11/2003	P0680	GEO-1i / GAT-7	
23	GEC Report dated February 2, 2004	2/2/2004	P0691 - P0716	GEC-2J / GAT-8	
24	AIA Contract PM-Georto	2/3/2004	P0327 - P0343	GEO-2N	
25	Fax from PM Construction to Paul Yasi dated February 6, 2004	2/6/2004	The second secon	GEO-2K	

		- 00101			
Indemnification Agreement dated February 9,	ruary 9,				
2004		2/9/2004		GE01-F	
GEC Reliance Letter to KeyBank in care of	re of				
James Hawkins dated February 11, 2004	004	2/11/2004	P0741 - P0752	GEC-1J	
KeyBank loan closing documents		2/19/2004	P1466 - P1595	GEO-2M	
Quitclaim Deed of Purchase of Union Street	Street			GEO-1D/	
Property by Georto, Inc.recorded February 20,	uary 20,			GAT-10/	
2004	•	2/20/2004		ROB-10	
Demand letter to Gateman from D. Kerester	rester				
dated April 26, 2004		4/26/2004	P0986 - P0987	GE0-1R	
Proposals submitted to PM Construction for	on for				
Removal of Debris		5/1/2004		GE02Q	
Letter dated May 6, 2004 from PM to James	James				
Hawkins and enclosures		5/6/2004		GEO-2R	
Communications from PM to Georto r	Georto regarding		P0049 - P0061;		
change order for removal of demolition debris	n debris		P0021 - P0029	GEO-2S	
Change Order / work authorization for removal	removal	6/21/2004;			
of demolition debris		6/7/2004		GEO-1P	
Georto check to PM Construction for removal of	emoval of				
debris per change order		7/10/2004	P0048	GE0-1Q	
Selected PM construction documents (costs,	(costs,				
application for payment, payments,					
subcontractor change orders, subcontractor	ractor				
invoices, etc.)				GEO-2T	
Letter from Jack Anetakis to Gateman dated	dated				
September 13, 2004		9/13/2004		GE0-1T	
S.W. Cole Geotechnical Engineering Evaluation	=valuation				
dated May 13, 2004		5/13/2004	P0876 - P0892	GEO-1S	
Supplemental S.W. Cole report dated					
December 20, 2005		12/20/2005		GEO-1S	
Solid Waste Report of Gregory C. Wirsen, MSc,	sen, MSc,				
dated December 28, 2005		12/28/2005		GEO-1S	
ROB-13. Documents concerning Insurance	rance				
Proceeds Received by William Gateman for	an for				
Union Street Property				ROB-13	

	Potential Exhibits That May Be Offered/Introduced by Sponsoring Party					
				Para de Carlos		
a	Lauren McKinlay site inspection / interview notes	5/2/2002	GEC001 - GEC008	GEO-2B		
q	Hawkins/Gateman Letter of Intent	3/20/2003		GEO-2H		
U	Fax from James Hawkins to Phillip Morin dated December 17, 2003	12/17/2003	P0771 - P0796	GEP-2i		
þ	Thomas Mattuchio invoices and corresponding trucking/disposal slips, summaries, etc.		P0161 - P0293; P0030 - P0047	GEO-2U		
Φ	Selected communications from Clay Collins		P1457; P1459 - P1461; P1411; P1428 - P1437; P1616 - P1625	GEO-2G		
ч	Selected documents from the City of Lynn Fire Department re property			GEO-2W		
b	Selected documents from Mass. Department of Environmental Protection re property			GEO-2X		
Ч	Bank Records of William Gateman concerning Union Street Property			ROB-14		
	Disputed Exhibits					
¥			ROB000001 - ROB000005	GEO-2F / ROB-5	GAT	
В	Notes of Steve McIntyre and Richard Pearle of PM	4/5/04 - 4/14/04	P0474 - P0475	GEO-2P	GAT / ROB Hearsay	Hearsay

			P0480 - P0481;			
ပ	Contemporaneous notes of James Hawkins	4/14/2004	P0476 - P0477	GEO-20	GEO-20   GAT / ROB   Hearsay	Hearsay
	Documents regarding property taxes owed by		The Particular of the Particul	GEO-1U/		
۵	Gateman	8/26/2004	P09893 - P0899	ROB-15	GAT	
ш	Handwritten notations re proceeds	8/30/2005		GEO-1V	GAT	

			P0480 - P0481;			
ပ	Contemporaneous notes of James Hawkins	4/14/2004	P0476 - P0477	GEO-20	GAT / ROB   Hearsay	Hearsay
	Documents regarding property taxes owed by			GEO-1U /		
۵	Gateman	8/26/2004	P09893 - P0899	ROB-15	GAT	
Ш	Handwritten notations re proceeds	8/30/2005		GEO-1V	GAT	